

MRHFM

maune • raichle • hartley
french & mudd, llc

CLAYTON THOMPSON
PARTNER

150 W. 30th Street, Suite 201 New York, NY 10001
Tel: 800.358.5922 Fax: 314.241.4838

August 10, 2023

The Honorable Michael B. Kaplan
United States Bankruptcy Court, District of New Jersey
Clarkson S. Fisher US Courthouse
402 East State Street, Courtroom #8
Trenton, NJ 08608

Re: LTL Management LLC, Case No. 23-12825 (MBK)

Dear Chief Judge Kaplan:

The Court asked for submissions related to the dismissal order, and at the Debtor's request, they were to be filed by Monday night. Tr. 8/2/23, 70:2-71:16. On Wednesday, the Debtor filed a two page "supplement" (Dkt. 1189), purporting to "respond to certain erroneous assertions" in the TCC's letter. *See* Dkt. 1174. Rather than moving to strike LTL's "supplement"—filed after the deadline and against this Court's instructions—MRHFM simply points out, once again, Johnson & Johnson's selective frugality.

J&J is happy to pay professionals whose clients support its bad faith bankruptcies. The Company's bizarre vendetta against the TCC, however, can only be attributed to the TCC's principled opposition to J&J's ongoing bankruptcy abuse. Here, having obtained dismissal—a win for all talc victims with valid claims—the TCC asks only to remain intact to "pursue and defend any Appeals" (TCC Proposed Order, ¶ 8) (cited by LTL's letter, pg. 2, Dkt. 1174). Of course, Johnson & Johnson opposes this. Having created this situation by re-filing in bad faith and having stopped all talc trials across the country for two years—as it turns out, for no good reason—the Company now wants *all* talc victims to pay for their own appellate lawyers.

The irony is that J&J isn't really going to appeal this Court's decision. The last thing Johnson & Johnson wants is the Third Circuit reviewing all the clandestine machinations that took place after the Circuit unambiguously rejected J&J from bankruptcy's "safe harbor" at the end of January.

Respectfully submitted:
MAUNE RAICHLÉ HARTLEY

FRENCH & MUDD, LLC



Clayton L. Thompson, Esq.
MAUNE RAICHLE HARTLEY
FRENCH & MUDD, LLC
150 W. 30th Street, Suite 201
New York, NY 10001
(800) 358-5922
cthompson@mrhfmlaw.com